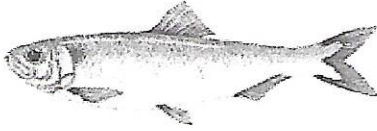


# Alewife Harvesters of Maine



“Conserving to preserve Maine’s heritage.”

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E.  
Washington, DC 20426

Dear Secretary Bose,

The Alewife Harvesters of Maine is a not for profit organization consisting of fishermen, conservation commissioners, biologists, environmental advocates, and other concerned citizens who have joined together to encourage and promote conservation, habitat restoration and the unimpeded passage of river herring with the goal of locally managed sustainable commercial harvests.

We write today to express our concern with the October fish kill, and fear for similar events in the future as the result of inadequate fish passage at Leonard Lake Dam, Ellsworth, Maine (Project #2727). Disturbing video documentation of maimed juvenile alewives was recorded by the Downeast Salmon Federation and can be viewed at:

<https://www.youtube.com/watch?v=XA4dTjInqy0>

For ecological and economic reasons, we would prefer to maximize production of river herring, both alewife and blueback herring, in the Gulf of Maine. The preferred bait for Maine’s iconic lobster industry is the Atlantic herring, but concerns about the status of the Atlantic herring population has led to bait shortages. In response, fishermen are making greater use of imported, frozen bait that may introduce harmful non-native organisms. A robust river herring population, large enough to support a bait harvest, would help safeguard the marine ecosystem that so much of Maine’s economy relies on.

The October 25, 2016 letter from Kevin Bernier, Senior Compliance Officer at Brookfield Power to Kimberly Bose of the Federal Energy Regulatory Commission, states that the 2016 river herring spawning escapement reflects a 225% increase over the 150,000 adult objective set for 2014. Maine Department of Marine Resources (MDMR) considers a population density of 235 river herring per acre to be a healthy level capable of supporting a commercial harvest. We argue that roughly 500,000 river herring is woefully short of the production potential in the Union River Watershed and Brookfield Power should be able to accommodate the 2 million+ river herring annual return to meet this standard. The current spawning escapement objective is merely 15% of the sustainable population density of Graham Lake.

Every juvenile alewife is precious to meet our river herring objectives for the Union River and the ability of alewife harvesters to meet the State’s economic needs.

AHM is interested in growing all of Maine's river fisheries. Eastern Maine is one of the most economically depressed areas in the United States and is heavily dependent on marine fisheries for employment. Arguably, elvers are one of the most vital fisheries for the Downeast region. The *2015 Annual Report to the Union River Fisheries Coordinating Committee* revealed that 43 of 47 radio tagged eels were detected passing through the turbines at the Ellsworth Dam with a 53% survival rate. Increasing the productivity of the Union River for eels is critical to the economic stability of the area. MDMR landings data indicate 1500 pounds of elvers were harvested from the Union River in 2013. With an average value of \$1800 per pound, the Union River elver fishery was worth \$2.7 million dollars. Again, every juvenile is important to meet our objectives for the Union River and the ability of elver harvesters to meet the State's economic needs.

While we support and appreciate the effort to improve fish passage at the Union River Dam facility, the results are not acceptable. We respectfully request that FERC carefully consider the economic and ecological value of the existing fisheries and require adequate fish passage be installed that provides a substantially improved survival rate for both upstream and downstream passage.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeffrey Pierce', with a stylized flourish at the end.

Jeffrey Pierce

Executive Director

Alewife Harvesters of Maine  
P.O. BOX 51  
Dresden, ME 04342